

**FIRST JUDICIAL DISTRICT  
COURT COUNTY OF SANTA FE  
STATE OF NEW MEXICO**

STATE OF NEW MEXICO, EX  
REL., HECTOR BALDERAS,  
ATTORNEYGENERAL,

Plaintiff,

vs.

PURDUE PHARMA L.P., et al.

Defendants.

NO. D-101-CV-2017-02541

**NOTICE OF FACT DEPOSITION OF CHAD ANDREW**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, pursuant to Rules 1-026 and 1-030 of the New Mexico Rules of Civil Procedure, Plaintiffs will take the deposition of Chad Andrew on February 28, 2022, at 9:00 a.m. CDT. Counsel will notify all parties seven (7) days prior to the deposition if proceeding in-person or via remote. If it is determined that the deposition will proceed via remote, it will be conducted in accordance with the protocol(s) established by the Court in the event that the witness is prepared or the deposition is defended remotely.

The deposition will be recorded stenographically, by video, and through instant visual display of testimony, before a notary public or other person authorized to administer oaths pursuant to Rule 1-028.

Pursuant to Rule 1-028, Plaintiffs will utilize Golkow Litigation Services for court reporting and videographer services. Contact information is Golkow Litigation Services, 1650

Market Street, Suite 5150, Philadelphia, PA, 19103. Telephone number is (215) 586-4220. Email address is [scheduling@golkow.com](mailto:scheduling@golkow.com).

Dated: February 3, 2022

RESPECTFULLY SUBMITTED:

HECTOR H. BALDERAS  
NEW MEXICO ATTORNEY GENERAL

/s/ P. Cholla Khoury  
Brian E. McMath  
P. Cholla Khoury  
201 3rd. St. NW, Suite 300  
Albuquerque, NM 87102  
bmcmath@nmag.gov  
ckhoury@nmag.gov  
Tel.: (505) 717-3531

Luis Robles  
Marcus J. Rael, Jr.  
ROBLES, RAEL & ANAYA, P.C.  
500 Marquette Ave., NW, Suite 700  
Albuquerque, New Mexico 87102  
Tel.: (505) 242-2228  
Fax: (505) 242-1106  
luis@roblesrael.com  
marcus@roblesrael.com

Russell W. Budd (pro hac vice)  
Christine C. Mansour (pro hac vice)  
BARON & BUDD, P.C.  
3102 Oak Lawn Avenue, Suite 1100  
Dallas, TX 75219  
Tel.: (214) 521-3605  
Fax: (214) 520-1181  
rbudd@baronbudd.com  
cmansour@baronbudd.com

Jennifer Fountain Connolly (pro hac vice)  
BARON & BUDD, P.C.  
600 New Hampshire Avenue NW  
Washington, DC 20037  
Tel.: (202) 333-487  
jconnolly@baronbudd.com

J. Burton LeBlanc, IV (pro hac vice)  
BARON & BUDD, P.C.  
2600 Citiplace Dr.  
Baton Rouge, LA 70808  
Tel: (225) 927-5441  
bleblanc@baronbudd.com

and

Peter J. Mougey (pro hac vice)  
Jeffrey Gaddy (pro hac vice)  
Levin, Papantonio, Rafferty, Proctor,  
Buchanan, O'Brien, Barr, and Mougey, P.A.  
316 S. Baylen Street, Suite 600  
Pensacola, FL 32502-5996  
Tel.: 850-435-7068  
Fax: 850-436-6068  
pmougey@levinlaw.com  
jgaddy@levinlaw.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2022 the foregoing has been served via email only to the Defendants in this action via the following listserv email address designated by Defendants:

[zOpioidNMAIDefendants@skaddenlists.com](mailto:zOpioidNMAIDefendants@skaddenlists.com)

/s/Jeff R. Gaddy

Jeff R. Gaddy (pro hac vice)

Levin, Papantonio, Rafferty, Proctor,  
Buchanan, O'Brien, Barr, and Mougey, P.A.

316 S. Baylen Street, Suite 600

Pensacola, FL 32502-5996

Tel.: 850-435-7068

Fax: 850-436-6068

[jgaddy@levinlaw.com](mailto:jgaddy@levinlaw.com)

*Attorney for Plaintiff*